(via email)

January 29, 2016 (file: 2059)

Mr. Scott Rice United States Environmental Protection Agency Waste and Chemicals Division 1060 Chapline Street Suite 303 Wheeling, WV 26003-2995 KEATING ENVIRONMENTAL MANAGEMENT, INC.

835 Springdale Drive Suite 200 Exton, PA 19341

610.594.2600 P 610.594.6100 F

keatingenvironmental.com

RE: PCB Transformer Removal - Serial Numbers C858009 and C858010

Benjamin Franklin High School

550 North Broad Street Philadelphia, Pennsylvania 19141



KEATING ENVIRONMENTAL MANAGEMENT

Environmental, Energy & Sustainability Solutions Dear Scott:

This letter provides USEPA with formal notification that the two PCB transformers which had been located at the School District of Philadelphia's Benjamin Franklin High School were removed from service without incident this past July (July 2015). In addition, this letter includes, for your records, the applicable manifests and final disposal documents.

The transformers that were removed were manufactured by the General Electric Company (Serial Numbers C858009 and C858010). According to transformer nameplate data, each transformer contained 810 gallons (approximately 10,600 pounds) of Pyranol fluid. These transformers had been operating under a Consent Decree between the School District of Philadelphia and the United States Environmental Protection Agency since March 1997.

As part of the project associated with the removal and replacement of the PCB transformers, a technical specification that included a description of the environmental requirements for the removal and disposal of the PCB transformers in accordance with the Consent Decree and applicable state and federal regulations was prepared.

A contract for the replacement of the transformers, inclusive of decommissioning and disposal of the PCB transformers was awarded to Eagle Industrial Electric, Inc. (EIE). EIE subcontracted various aspects of the work, including the transformer draining, the transportation and disposal of the PCB transformers, the dielectric fluid and debris associated with PCB activities to Clean Harbors Environmental Services.

Keating Environmental was on-site during the decommissioning and removal of the PCB transformers. The process was performed without incident. A post-removal inspection of the floor area proximate to the former transformers and work areas revealed no evidence of leaks or spills.

A WBE Certified Corporation





Printed on recycled paper



Mr. Scott Rice United States Environmental Protection Agency January 29, 2016 Page 2 of 2

For your records, I have enclosed documentation regarding the disposal of the transformers, the dielectric fluid and debris generated during the removal of the transformers.

Please contact me if you have any questions or comments.

Regards

KEATING ENVIRONMENTAL MANAGEMENT, INC.

Keith Choper, PE, LEED-AP

Keild Choper

President

Attachments: Uniform Hazardous Waste Manifests with supporting

documentation - Manifests 008068335FLE and

008068453FLE

cc:

Ms. Francine Locke, Mr. Jerry Junod - School District of

Philadelphia (via email)

File 5385 File 2059



KEM

## Benjamin Franklin HS Complete Disposal Documentation - January 28, 2016

Manifest	Manifest Line No.	Material	Number of Containers	Certificate of Disposal C File, disposal date		
008068335 FLE	1	liquid - oil	3	8/9/2015		
008068335 FLE	2	solid - drum	1	9/18/2015		
008068335 FLE	3	transformer	1	1/7/2016		
008068453FLE	1	liquid - oil	3	12/20/2015		
008068453FLE	2	transformer	1	1/12/2016		
008068453FLE	3	solid - drum	3	9/18/2015		

# Benjamin Franklin HS PCB Disposal Documentation Manifest 008068335 FLE

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## CLEAN HARBORS PPM, LLC-PCB CONTINUATION SHEET

\*\*Each Unit Must Be Marked On Sheet With All Corresponding Information Filled In\*\*
\*\*THIS PAGE MUST MATCH THE MANIFEST IT ACCOMPANIES\*\*AND MUST ACCOMPANY ALL MANIFESTS

GENERATOR School District of Philadelphia Bew Frenk 1 High School MANIFEST 008068335 Mst. Unit Unique Generator ID Material Out of Service Transformer Full or Line# Type PCB Number Serial Number Type Date KVA Туре Phase LBS KGS . Empty Level 951 CM TW10 oil full 7500 Tw11 0,6 Full 7500 TWIZ O.L Full BEI Debui ~ Full y Crum BF3 C850009 3 Sulsti 3 7500 UNIT TYPES: Phase MATERIAL TYPE: TRANSFORMER TYPE: DM=DRUM METAL Single Phase SWITCH OCB POLE DF=DRUM FIBER Three Phase BUSHING OIL PAD

CAPACITOR TRANSFORMER

SUBSTATION

CM-CONTAINER METAL



## **CERTIFICATE OF DISPOSAL**

Generator Facility Name:

Ben Franklin Hìgh School

Philadelphia, PA, 19130

Sales Order#:

1502104679

Generator Address:

440 N. Broad Street 3rd floor Portal C

Date Received:

7/8/2015

Generator Contact Name:

Generator	Generator EPA ID:		EREQUIRED		Load	#:	
					Manif	est #:	008068335FLE
Original CH ID #	Date Removed From Service		Serial # / Customer ID	Material Description	Disposal Date	Method Disposa	
45914340	7/1/2015	TP	T-10 /	High Btu PCB Liquids For Incineration	8/9/2015	Incineratio	n Aragonile, UT Facility
45914341	7/1/2015	TP	T-11/	High Btu PCB Liquids For Incineration	8/9/2015	Incineratio	n Aragonite, UT Facility
45914342	7/1/2015	TP	T-12/	High Btu PCB Liquids For Incineration	8/9/2015	Incineratio	n Aragonite, UT Facility

Under Civil and Criminal Penalties of Law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Authorized Agent

Tuesday, August 11, 2015



## CERTIFICATE OF DISPOSAL

Generator Facility Name:

Ben Franklin High School

Philadelphia, PA, 19130

Sales Order#:

1502104679

Generator Address:

Generator EPA ID:

440 N. Broad Street 3rd floor Portal C

Date Received:

7/8/2015

Generator Contact Name:

NONEREQUIRED

Load #:

Manifest #:

008068335FLE

Original Date Removed Unit CH ID# From Service Type

Serial # / Customer ID

Material Description Disposal Date

Method of Disposal

**Disposal Facility** 

45914343

7/1/2015

DM

BF-1/

PCB Sollds For Landfill

9/18/2015

Landfill

Grassy Mountain, UT Facility

Under Civil and Criminal Penalties of Law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Monday, September 21, 2015



## **CERTIFICATE OF DISPOSAL**

Manifest Mailing Name:

Ben Franklin High School

Manifest Mailing Address:

440 N. Broad Street 3rd floor Portal C

Job Address:

550 North Board St

Philadelphia, PA, 19130

Philadelphia, PA 19130

Customer Contact Name:

Mr Gerald Rothstein

Date Received

7/8/2015

Generator EPA ID:

40CFRPART761

1502104679

Load #:

Manifest #:

008068335FLE-

Original Date Removed Unit CHID# From Service Type

Sales Order#:

Serial # / Customer ID

45914344

Material Description Disposal Date

Method of Disposal

**Disposal Facility** 

46233792

7/1/2015

CM C850009 /

Transformer

1/7/2016

Decommission

Coffeyville, KS Facility

Under Civil and Criminal Penalties of Law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Friday, January 08, 2016

# Benjamin Franklin HS PCB Disposal Documentation Manifest 008068453 FLE

46495069-5075

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## CLEAN HARBORS PPM, LLC-PCB CONTINUATION SHEET

"Each Unit Must Be Marked On Sheet With All Corresponding Information Filled In\*"
"THIS PAGE MUST MATCH THE MANIFEST IT ACCOMPANIES" AND MUST ACCOMPANY ALL MANIFESTS

GENERATOR School District of Miladelphia

MANIFEST 008068453 FUE

Mst. Line #	Unit Type	Unique Generator ID Number	Serial Number	Material Type	Out of Service Date	KVA	Transformer Type	Phase	LBS	KGS.	Full or Empty	PCB Level
181	79		TW13	oil	7-27-15	_	-	_	3483	1585	Fall	7500
781	TP		Tw 1	1				-	3483	1583	1	
161	TP		TWSS	1				-	3983	1513	I	11
782	CM	T-1	\$ C858010	Chane		1500	Substa	3	13,150	5917	MT	7500
		21	_	Debar				_	100	45	full	1
		D-2 ·	l <del>-</del>	Dehri		-		-	100	45	Full	
9.83	DM	D-3	_	Debai		-	<del>-</del>	=	250	114	Ful	1
						-						-
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			•	- -	-					w-		
	TYPI		Phase	+-	MATERIAL T	1			-			1

UNIT TYPES: DM=DRUM METAL DF=DRUM FIBER OMECONTAINER METAL

Phase Single Phase Three Phase

MATERIAL TYPE: SWITCH OCB BUSHING OIL CAPACITOR TRANSFORMER TRANSFORMER TYPE: POLE PAD SURSTATION



## **CERTIFICATE OF DISPOSAL**

Generator Facility Name:

Ban Franklin High School

Philadelphia, PA, 19130

Sales Order#:

1502104679

Generator Address:

Generator EPA ID:

440 N Broad Street 3rd floor Portal C

Date Received:

7/30/2015

Generator Contact Name:

40CFRPART761

Load #:

Manifest #:

008068453FLE

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Original CH ID #	Date Removed From Service		Serial # / Customer ID	Material Description	Disposal Date	Method of Disposal	Disposal Facility
46495069	7/27/2015	TP	TW13/	High Btu PCB Liquids For Incineration	12/20/2015	Inclneration	Deer Park, TX Facility
46495070	7/27/2015	TP	TW1 /	High Blu PCB Liquids For Incineration	12/20/2015	Incineration	Deer Park, TX Facility
46495071	7/27/2015	TP	TWSS/	High Stu PCB Liquids For Incineration	12/20/2015	Incineration	Deer Park, TX Facility

Under Civil and Criminal Penalties of Law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2815), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Authorized Agent

Monday, December 21, 2015



## **CERTIFICATE OF DISPOSAL**

Manifest Mailing Name:

Ben Franklin High School

Manifest Mailing Address:

440 N. Broad Street 3rd floor Portal C

Job Address:

550 North Board St

Philadelphia, PA, 19130

**Customer Contact Name:** 

Mr Gerald Rothstein

Philadelphia, PA 19130

Generator EPA ID:

40CFRPART761

Date Received:

7/30/2015

Sales Order#:

Load #: Manifest #:

008068453FLE

Original Date Removed Unit

1502104679

Material

Disposal

CHID# From Service Type

Serial # / **Customer ID** 

Description

Date

Method of Disposal

**Disposal Facility** 

46495072

7/27/2015

C658010 /

Transformer

1/12/2016

Decommission

Coffeyville, KS Facility

Under Civil and Criminal Penalties of Law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the Identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Wednesday, January 13, 2016



## **CERTIFICATE OF DISPOSAL**

Generator Facility Name:

Ben Franklin High School

Philadelphia, PA, 19130

Sales Order#:

1502104679

Generator Address:

440 N. Broad Street 3rd floor Portal C

Date Received:

7/30/2015

Generator Contact Name:

Generator EPA ID:

NONEREQUIRED

Load #:

Manifest #:

008068453FLE

Original CH ID #	Date Removed From Service		Serial # / Customer ID	Material Description	Disposal Date	Method of Disposal	Disposal Facility
46495073	7/27/2015	DM	1 / D-1	PCB Solids For Landfill	9/18/2015	Landfill	Grassy Mountain, UT Facility
46495074	7/27/2015	DM	2 / D-2	PCB Solids For Landfill	9/18/2015	Landfill	Grassy Mountain, UT Facility
46495075	7/27/2015	DM	3 / D-3	PCB Solids For Landfill	9/18/2015	Landfill	Grassy Mountain, UT Facility

Under Civil and Criminal Penalties of Law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Authorized Agent

Monday, September 21, 2015